



**MCI Telecommunications  
Corporation**

1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

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OCT 26 1995

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COMMISSION

October 26, 1995

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, NW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: In the Matter of US WEST Access Billing  
Requirements for Joint Service Provision  
Amended Petition for Rulemaking

Dear Mr. Caton:

Enclosed herewith for filing are the original and four (4) copies of MCI Telecommunications Corporation's Opposition regarding the above-captioned matter.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI Opposition furnished for such purpose and remit same to the bearer.

Sincerely,

Christopher Bennett  
Senior Staff Member

No. of Copies rec'd  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

OCT 26 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of: )  
 )  
US WEST ) RM-8540  
Access Billing Requirements )  
for Joint Service Provision )  
 )  
\_\_\_\_\_ )

DOCKET FILE COPY ORIGINAL

**OPPOSITION**

MCI respectfully asks the Commission to deny US WEST's Amended Petition for Rulemaking in the above-captioned proceeding.<sup>1</sup> Now that US WEST has finally put some purported "cost" data on the record to justify its proposal, MCI has examined the data and finds it unconvincing. There is no reason to institute a rulemaking that would allow local exchange companies (LECs) in meet point arrangements to generate multiple bills for interexchange carriers (IXCs) to process and audit. This is US WEST's second try at convincing the Commission to initiate a rulemaking to overturn the Commission's eight-year old policy of requiring single bills to IXCs for meet point arrangements. US WEST's initial effort did not produce an overwhelming outcry of support on the part of the LECs, and for that reason alone

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<sup>1</sup> In the Matter of Access Billing Requirements for Joint Service Provision, Amended Petition for Rulemaking, RM-8540, filed October 3, 1995, (Amended US WEST Rulemaking Petition); and In the Matter of Access Billing Requirements for Joint Service Provision, Petition for Rulemaking, RM-8540, filed November 1, 1994, (US WEST Rulemaking Petition).

the Commission should seriously consider whether a rulemaking is necessary. MCI previously opposed US WEST's original petition. Since US WEST repeats many of its same arguments in its amended filing, MCI incorporates by reference our original rulemaking opposition. In this opposition, MCI comments only on new material US WEST has added to the record.<sup>2</sup>

US WEST's public interest argument is either incorrect or misleading. As a threshold matter US WEST assumes the cost to process a single invoice is \$25. This information is useless. US WEST does not support its assumption with any proof that it is based on fact. For instance US WEST neglects to link the \$25 assumption to: (1) whether it represents the expense information shown in Attachment A; (2) whether it represents the incremental cost of an invoice or the fully allocated incremental cost plus overheads; (3) whether or not it should be matched with the revenues displayed in Attachment A; and (4) exactly what does each of the columns in Attachment A represent and how does it support US WEST's rulemaking request. It is simply wrong for US WEST to expect the Commission to base its rulemaking

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<sup>2</sup> See MCI Opposition In the Matter of US WEST Access Billing Requirements for Joint Service Provision Petition for Rulemaking, filed December 7, 1994; and MCI Reply Comments (RM-8540) In the Matter of US WEST Access Billing Requirements for Joint Service Provision Petition for Rulemaking, filed December 22, 1995 (MCI Opposition).

decision on a sheet of unexplained numbers and an invoice cost assumption. MCI believes US WEST's \$25 per invoice guess, and Attachment A, should be ignored until US WEST provides sufficient information to allow a reasonable evaluation of its evidence.

US WEST also seeks to use its amendments to present irrelevant inter-LEC transactions as evidence that the single bill requirement is not in the public interest. This claim misses the mark. What is germane is the fact that US WEST's alternative lata-level billing approach will place a greater auditing burden on the IXC's -- regardless of the magnitude of that burden -- than the single bill arrangement chosen by the Commission. US WEST's single and multiple check theory should not be considered in this proceeding.<sup>3</sup>

The final US WEST public interest assertion is illusory. US WEST files Attachment B and claims that it shows about 20 percent of its single bill requirement invoices "make[] no economic sense to bill" because the invoice amount is less than \$1.<sup>4</sup> But since we have no reasonable cost information, it is not clear whether this is unreasonable or not. Furthermore, the possibility that some

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<sup>3</sup> US WEST should present a detailed benefit-to-cost analysis, comparing its single and multiple check theory to the Commission's single bill requirement, if it even wants the Commission to seriously consider its proposal.

<sup>4</sup> Amended US WEST Rulemaking Petition, *supra* note 1, p. 6.

customer might produce revenues that are less than the cost of billing is simply a reality of business. It is incumbent upon LECs, IXC's, and any entity to consider and manage that factor during their business operations. The need for such routine management does not merit a rulemaking.

For the reasons stated above, and in MCI's Opposition filings, MCI once again urges the Commission to deny US WEST's petition for rulemaking.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

BY: \_\_\_\_\_

Christopher Bennett  
Senior Staff Member  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006  
(202) 887-2402  
Dated: October 26, 1995

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on October 26, 1995.

A handwritten signature in dark ink, appearing to read "Chen 1307", is written over a horizontal line.

Christopher Bennett  
Senior Staff Member  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006  
(202) 887-2402

**CERTIFICATE OF SERVICE**

**I, Stan Miller, do hereby certify that copies of the foregoing Opposition were sent via first class mail, postage paid, to the following on this 26th day of October 1995.**

Kathleen Wallman\*\*  
Chief, Common Carrier Bureau  
Federal Communications  
Commission  
Room 500  
1919 M Street, N.W.  
Washington, DC 20554

Kathleen Levitz\*\*  
Federal Communications  
Commission  
Room 500  
1919 M Street NW  
Washington, DC

Geraldine Matise\*\*  
Acting Chief, Tariff Division  
Federal Communications  
Commission  
Room 518  
1919 M Street, N.W.  
Washington, DC 20554

Ann Stevens\*\*  
Federal Communications  
Commission  
Room 518  
1919 M Street, N.W.  
Washington, DC 20554

David Nall \*\*  
Deputy Chief, Tariff Division  
Federal Communications  
Commission  
Room 518  
1919 M Street, NW  
Washington, DC 20554

Judy Nitsche\*\*  
Federal Communications  
Commission  
Room 514  
1919 M Street, NW  
Washington, DC 20554

ITS\*\*  
Federal Communications  
Commission  
1919 M Street NW  
Washington, DC 20554

C. Scott McClellan  
US West Communications, Inc.  
1801 California Street  
Room 4750  
Denver, Colorado 80202

James T. Hannon  
Ms. Cyndie Eby  
U S West, Inc.  
1020 19th Street N.W.  
Suite 700  
Washington, DC 20036

Michael S. Pabian  
Ameritech Operating Companies  
Room 4H76  
2000 West Ameritech Center  
Drive  
Hoffman Estates, IL 60196

M. Robert Sutherland  
Richard M. Sbaratta  
Rebecca M. Lough  
BellSouth Telecommunications,  
Inc.  
4300 Southern Bell Center  
675 West Peachtree Street,  
N.E.  
Atlanta, GA 30375

Michael B. Fingerhut  
Norina T. Moy  
Sprint Communications Company,  
Inc.  
Suite 1100  
1850 M Street, N.W.  
Washington, DC 20036

**Hand Delivered\*\***

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Stan Miller

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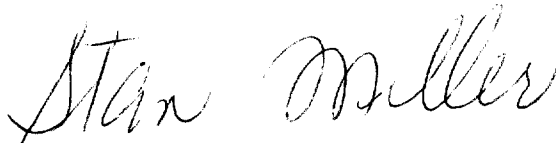
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**Stan Miller**